

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ELENA DINVERNO, *an individual*,

Plaintiff,

vs.

Case No. 21-cv-11001
Hon. Mark A. Goldsmith
Mag. Kimberly G. Altman

**ROCHESTER COMMUNITY
SCHOOLS DISTRICT**, *a government entity*,
KRISTIN BULL, *in her individual and official
capacity*, **DR. ROBERT SHANER**, *in his
individual and official capacity*,

Defendants.

DEBORAH GORDON LAW

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PLAINTIFF'S INITIAL WITNESS LIST

Plaintiff Elena Dinverno, by and through her attorneys, Deborah Gordon Law, submits the following Initial Witness List pursuant to this Court's Scheduling Order (ECF No. 16).

RESERVATION OF RIGHTS

Plaintiff expressly reserves the right to supplement her Witness List up to and including the date the Joint Final Pretrial Order is filed. As discovery remains ongoing, Plaintiff may not presently be able to fully identify all of the witnesses she anticipates calling to testify at the time of trial. Plaintiff accordingly reserves the right to supplement this Witness List to name any fact witnesses about whose knowledge or potential testimony she may become aware of during the discovery period of this action, and to rely in these proceedings on the testimony of any such witnesses.

WITNESS LIST

1. Plaintiff Elena Dinverno
2. Dr. Robert Shaner
3. Kristin Bull
4. Martin Blake
5. Debi Fragomeni
6. Andrew Blake
7. Sandra Blake
8. Andrea Blake
9. Robert Sharpe

10. Stacy Sunde
11. Lori Grein
12. Amy Schuster
13. Christina Whitmore
14. Amy DiCresce
15. Kevin Beers
16. Michael Zabat
17. Michelle Bueltel
18. Barbara Anness
19. Scott Muska
20. Joseph Pittel
21. Andrea Walker-Leidy
22. Meredith McCutcheon
23. Joshua Raymond
24. Andrew Weaver
25. Jessica Opfer
26. Rick McClatcher
27. Stephanie VanDaele
28. Chief Steve Schettenhelm
29. Jeremy Chisholm
30. Any and all current or former employees of Blake's Hard Cider

31. Any and all current or former employees of Blake's Orchard
32. Any and all current or former employees of Rochester Community Schools District
33. Any and all current or former employees of Rochester Police Department
34. Any and all of Plaintiff's treating physicians and/or healthcare providers
35. Any and all witnesses identified by Defendants in its current or amended witness lists
36. All persons referred to in any Complaint, Answer, or pleading filed in this lawsuit but not specifically named
37. All persons or entities referred to in depositions, interrogatories, answers to interrogatories, responses to request for documents, responses to requests for admission, or responses to third-party subpoenas
38. Any and all necessary rebuttal law and expert witnesses, including without limitation any expert witnesses identified by any parties
39. Any and all witnesses necessary to lay the foundation for the admission of evidence
40. Any and all witnesses necessary to authenticate, impeach, or rebut
41. Plaintiff reserves the right to add any additional expert witnesses that may become necessary or lay witnesses as they become known through the course of additional discovery.

Dated: January 3, 2022

DEBORAH GORDON LAW

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CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2022 I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing and service of said documents to all parties through their counsel of record.

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